

**To:** Robin, George[Robin.George@epa.gov]  
**From:** George Robin  
**Sent:** Tue 4/15/2014 3:54:27 PM  
Aera Energy WD 00000016.doc

----- Forwarded by George Robin/R9/USEPA/US on 04/15/2014 08:54 AM -----

From: George Robin/R9/USEPA/US  
To: Robin.George@epa.gov,  
Date: 08/30/2011 11:21 AM  
Subject: Fw:(2008 AERA Ex. in So. Belridge) RB5 concern

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----- Forwarded by George Robin/R9/USEPA/US on 08/30/2011 11:20 AM -----

From: David Albright/R9/USEPA/US  
To: George Robin/R9/USEPA/US@EPA  
Date: 02/06/2009 12:17 PM  
Subject: RB5 concern

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Hi George,

I learned yesterday that RB5 has some concerns about the proposed DOGGR UIC permitting action and proposed aquifer exemption in the South Belridge oil field. I spoke to one staff person and got the number of the individual who has the lead for RB 5. His name is Shelton Gray and his number is 559-445-5508. Of course, RB staff are furloughed today, so let's plan to call Shelton Monday. We can talk Monday about whether you think we should have DOGGR on the call or just have an initial call with RB first. In the meantime, could you get me a copy of the notice that DOGGR issued. I think it was the 26th or 29th of Jan that they did their formal notice. Thanks.

David

----- Forwarded by George Robin/R9/USEPA/US on 04/15/2014 08:54 AM -----

From: George Robin/R9/USEPA/US  
To: Robin.George@epa.gov,  
Date: 08/30/2011 11:19 AM  
Subject: Fw: Draft So.Belridge (Example) Region 9 Public Notice for Aquifer Exemption

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----- Forwarded by George Robin/R9/USEPA/US on 08/30/2011 11:19 AM -----

From: George Robin/R9/USEPA/US  
To: "Ellison, Burt" <Burt.Ellison@conservation.ca.gov>  
Date: 12/08/2008 03:41 PM  
Subject: Draft So.Belridge (Example) Region 9 Public Notice for Aquifer Exemption

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Hi Burt,

I used the information for the South Belridge Field that we worked on. I guess the key is that there is a geographic lateral and a geologic vertical description of the aquifer that is being exempted from protection.

George  
415-972-3532

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**DRAFT  
PUBLIC NOTICE OF INTENT TO ISSUE AN  
UNDERGROUND INJECTION CONTROL (UIC) AQUIFER EXEMPTION**

**Purpose of Public Notice**

The U.S. Environmental Protection Agency (EPA) is soliciting public comments on its proposal to issue a Non-substantial Revision to the UIC program for California Division of Oil, Gas, and Geothermal Resources (CDOGGR) Class II Injection Operations and that this revision constitutes a minor Aquifer Exemption. This Aquifer Exemption is proposed in conjunction with the public comment period for a Class II UIC permit issued to AERA Energy LLC in the South Belridge Oil Field by the CDOGGR.

The zone that EPA is proposing to exempt as an underground source of drinking water (USDW) is described as follows:

(1) the Tulare Pay-Above-A zone to the base of the Tulare zone geologic strata (the zone) which occur at this location within the subsurface interval ranging approximately 450 feet to 1,550 feet below ground surface (bgs); and

(2) laterally within the following sections of Township 28 South, Range 21 East, Kern County, California:

Sections 8 (South  $\frac{1}{2}$ ), 9 (SW  $\frac{1}{4}$ ), 15 (SW  $\frac{3}{4}$ ), 16, 17, 20 (NW  $\frac{1}{4}$ ), 21 (North  $\frac{1}{2}$ ), 22, 23 (SW  $\frac{3}{4}$ ), 27 (East  $\frac{1}{2}$ ), 26, 35 (North  $\frac{1}{2}$ )

**Background**

The EPA has reviewed a request from the CDOGGR for aquifer exemption of the above referenced zone. In concurrence with the CDOGGR, the EPA has determined that the zone meets the criteria for aquifer exemptions pursuant to 40 CFR §146.4:

The zone does not currently serve as a source of drinking water;

The zone cannot now and will not in the future serve as a source of drinking water because:

The zone is situated at a depth or location which makes recovery of water for drinking water purposes economically or technologically impractical; and the total dissolved solids content of the water within the zone is more than 3,000 milligrams per liter (mg/l) and less than 10,000 mg/l and it is not reasonably expected to supply a public water system.

Therefore, the EPA has made a preliminary determination to approve the request.

**Public Comments**

Public comments will be accepted, in writing, at the CDOGGR District 4 office in Bakersfield to Mr. Burton Ellison; 4800 Stockdale Hwy., Suite 417; Bakersfield, CA 93309 during the thirty (30) day comment period. A request for a public hearing must be made in writing and should state the nature of any issues to be proposed for discussion at the hearing. A PUBLIC HEARING WILL BE HELD ONLY IF

SIGNIFICANT INTEREST IS SHOWN.

#### Requests for Additional Information

Requests for further information may be directed to Mr. Burton Ellison, CDOGGR District 4; 4800 Stockdale Hwy., Suite 417; Bakersfield, CA 93309; phone (661) 322-4031; or to Mr. George Robin, U.S.E.P.A. Region 9; 75 Hawthorne St. WTR-9; San Francisco, CA 94105; phone (415) 972-3532.

#### Final Decision and Appeal Process

A final decision to issue, modify, or deny the aquifer exemption will be made after all comments have been reviewed. Notice of the decision will then be sent to each person who has either requested such notice or has submitted written comments.

If issued, the aquifer exemption shall become effective immediately, provided that there were no comments requesting a substantial change to the final decision. If substantial changes were requested or were incorporated into the final aquifer exemption, the final aquifer exemption will become effective thirty (30) days after issuance.

Within those thirty (30) days from the date of issuance (before the final aquifer exemption becomes effective), any person who filed comments, participated in a public hearing, or took issue with any changes to the aquifer exemption may petition the Director to review the decision. Persons interested in appealing the final aquifer exemption decision should refer to 40 CFR §§ 124.15 and 124.20 for the procedural requirements of the appeal process.

----- Forwarded by George Robin/R9/USEPA/US on 04/15/2014 08:54 AM -----

From: George Robin/R9/USEPA/US  
To: Robin.George@epa.gov,  
Date: 08/30/2011 11:18 AM  
Subject: Fw:(2008 So. Belridge) Legal Notice for the Aera Tulare zone exemption and new water disposal project

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----- Forwarded by George Robin/R9/USEPA/US on 08/30/2011 11:17 AM -----

From: "Ellison, Burt" <Burt.Ellison@conservation.ca.gov>  
To: George Robin/R9/USEPA/US@EPA  
Cc: "Chambers RL (Ron) at Aera" <RLChambers@aeraenergy.com>, "Adams, Randy" <Randy.Adams@conservation.ca.gov>, "Mitchell, Dave" <Dave.Mitchell@conservation.ca.gov>  
Date: 11/25/2008 10:46 AM  
Subject: Legal Notice for the Aera Tulare zone exemption and new water disposal project

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George,

Here is a draft of the Division's legal notice for the new Tulare water disposal project located adjacent to the South Belridge field. Our notice needs to run for 3 consecutive days and yours need to run on a Sunday. I think it would be best to run both notices at the same time. Please let me know when you are ready to place your legal notice and I will contact the Bakersfield Californian.

Sincerely,

Burton Ellison  
Division of Oil, Gas, and Geothermal Resources  
Associate Oil and Gas Engineer  
661-334-3674  
661-861-0279 (fax)  
*(See attached file: Aera Energy WD 00000016.doc)*